



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

COPY

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article No. 7001 0320 0002 5013 4752

MAY 3 2002

Mr. Michael L. House
Manager, Remedial Projects
Solutia Inc.
P. O. Box 66760
St. Louis, MO 63166-6760

Dear Mr. House:

RE: Notice of Violation
Coal Storage Yard
Solutia - J.F. Queeny Facility
St. Louis, Missouri
EPA ID No. MOD 004 954 111

The U.S. Environmental Protection Agency (EPA) Region 7, in coordination with the Missouri Department of Natural Resources (MDNR) has received and reviewed Solutia, Inc.'s (Solutia) the "Expedited Risk Evaluation, Former Coal Storage Area, Solutia - Queeny Facility St. Louis, Missouri," prepared by URS and dated April 10, 2002. This document was reviewed for adherence to the EPA's "Risk Assessment Guidance for Superfund," (RAGS) (EPA 1989a), and for consistency with best professional practices.

As you are aware, the expedited risk evaluations have been submitted in order to resolve an outstanding Notice of Violation (NOV) issued by EPA to Solutia on September 3, 1997 for violation of its Hazardous and Solid Waste Amendments (HSWA) permit. Specifically, EPA alleges that Solutia violated its HSWA permit by selling portions of its property without prior notification to EPA or the MDNR. The portions of the property which were sold included the Former Coal Storage Area, which is listed as a Solid Waste Management Unit (SWMU) and under investigation according to the terms and conditions of the HSWA permit.

The purpose of this letter is to notify Solutia that the issue identified in the Notice of Violation has been addressed by the collection of additional data at the Former Coal Storage Yard and the preparation of the Expedited Risk Assessment. EPA agrees with the risk assessment's conclusion that risks and hazards in this area are within acceptable limits for



R00191271

RCRA RECORDS CENTER



continued industrial use. Should the future use change, the area needs to be re-examined and an exposure assessment conducted which would take into account any non-industrial uses.

If you have any questions regarding this correspondence, please do not hesitate to contact me at (913) 551-7719.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie B. Doolan". The signature is fluid and cursive, with the first name being the most prominent.

Stephanie B. Doolan
Project Manager
RCRA Corrective Action and Permits Branch

cc: Vin Journey, MDNR

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Sincerely,

Stephanie B. Doolan
Project Manager
RCRA Corrective Action and Permits Branch

cc: Vin Journey, MDNR

ARTD/RCAP:SDOOLAN:CS::H:/RCAP Branch/Lowe Unit/Doolan/Solutia/NOV Resolution
Coal Storage Yard.wpd

RCAP
DOOLAN

SPD
5/3/02

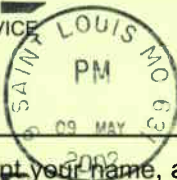
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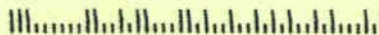
REC'D

MAY 14 2002

US ENVIRONMENTAL PROTECTION AGENCY
REGION 7 - ARTD \ RCAP
901 N. 5TH STREET
KANSAS CITY, KS 66101

RCAP

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Michael House

Michael House
Solutia Inc
PO Box 66760
St. Louis, MO 63166-6760

2. Article Number (Copy from service label)

7001 0320 0002 5013 4752

COMPLETE THIS SECTION ON DELIVERY

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